

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 12 CR 3182 JB

JAIRUS GRANADO,

Defendant.

**SECOND UNOPPOSED MOTION TO MODIFY
DEFENDANT'S CONDITIONS ON PRE-TRIAL RELEASE**

COMES NOW, the Defendant, Jairus Granado, by and through his attorney of record, Phillip G. Sapien, *Sapien Law, LLC*, and with concurrence of counsel for the government, Shana B. Long, and hereby respectfully moves the Court to issue an Order removing Defendant's current ankle bracelet/RF Monitoring.

As grounds in support of this Motion, counsel states as follows:

1. Mr. Granado was previously released on January 30, 2013 with Pre-trial Services Supervision (PTS) and location monitoring condition requiring GPS monitoring by the Honorable James O. Browning.
2. Mr. Granado was later placed on RF monitoring and has been on such monitoring for almost 18 months.
3. PTS Officer, Mr. Jason Beaty, has advised undersigned counsel as well as counsel for the government, Shana B. Long that Mr. Granado has remained compliant with all Conditions of Release and is gainfully employed.

4. Consequently, Mr. Beaty believes that the ankle bracelet/RF monitoring requirement is no longer necessary in this case and does not oppose this Motion to remove this condition of release requirement.

5. Mr. Granado understands that he must remain compliant with all other PTS requests and conditions of his release.

6. Counsel for the government, Shana B. Long, does not oppose this Motion or the relief requested herein

WHEREFORE, Defendant Jairus Granado respectfully requests this Court to issue an Order Modifying Defendant's current Pre-Trial Services conditions to remove the ankle bracelet/RF Monitoring requirement as part of his conditions of release in this case and to impose any other reasonable conditions of release the Court feels are appropriate.

Respectfully Submitted,

SAPIEN LAW LLC

Electronically Filed by
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I hereby certify that a true and correct copy of the foregoing pleading was electronically delivered to all parties of record on this 28th day of May, 2014.

/S/
PHILLIP G. SAPIEN

Second Unopposed MT Modify PTS Conditions
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